

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**FREEDOM FROM RELIGION  
FOUNDATION, INC.  
Plaintiff,**

**-vs-**

**GOVERNOR GREG ABBOTT,  
And ROD WELSH, Executive Director of the  
Texas State Preservation Board,  
Defendants.**

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**CASE NO. 1-16: CV-00233**

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Plaintiff, Freedom From Religion Foundation, Inc., files this unopposed motion for a thirty-day extension of time to file its FRCP 54(d)(2)/Local Rule CV-7(j) Fee and Expense Motion.

This extension will allow the parties to continue conferring in an effort to reach resolution and agreement of all fee issues.

Counsel for the parties have conferred and jointly request the relief sought herein. Defendants, therefore, do not oppose this motion.

Pursuant to Local Rule CV-7(j), “a claim for fees shall be made by motion not later than 14 days after entry of judgment pursuant to Federal Rule of Civil Procedure 54(d)(2).” Here, final judgment was entered on May 5, 2021. Thus, the due date of Plaintiff’s fee and expense motion is May 19, 2021.

This litigation has been pending since January of 2016. As a result, documentation of fees is extensive, necessitating considerable view and conference between the parties in an effort to potentially reach agreement. The parties, in fact, are engaged in that process, which is not complete.

WHEREFOR, Plaintiff respectfully requests the court to extend the deadline to file its attorneys' fee and expense motion up to and including June 18, 2021.

Dated this 17th day of May, 2021.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system on this the 17th day of May, 2021, which will send notification to the following:

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